

# COVID-19 Employer FAQs

*Issued: March 23, 2020*

This policy statement is intended to provide general guidance regarding actions taken by Humana in response to the COVID-19 public health emergency. Please refer to applicable Humana policy (or policies) for additional information. All other coverage rules will continue to apply. Humana reserves the right to make changes to its policy in order to comply with applicable law and to further respond to the COVID-19 public health emergency. The policy described herein will remain in place until May 31<sup>st</sup> or for the duration of the effective public health emergency period, whichever is sooner.

## General Questions

**Q. What is Humana's course of action regarding COVID-19?**

A. Humana has announced the following resources for our employers and members in response to COVID- 19:

- Waived COVID- 19 testing costs
- Waived telemedicine costs for all urgent care needs for next 90 days
- Early prescription refills allowed for the next 30 days
- Member support line is available

**Q. What type of groups do the four actions identified in the bullets above cover and can self-funded groups opt out of Humana's COVID-19 provisions?**

A. These provisions apply to all Humana plans and funding types. The federal Families First Coronavirus Response Act (HR 6201) that was signed into law last week states that all group health plans including self-funded and fully insured health plans must now cover the COVID-19 tests and related office visits (in-person or telehealth, urgent care or emergency room care) without cost sharing (including deductibles, copayments, and coinsurance), prior authorization, or other medical management requirements for their employees and covered dependents. While the new Families First Coronavirus Response Act (HR 6201) applies to COVID related telemedicine, most ASO customers have elected to include broad telemedicine coverage to protect their employees seeking care, in a way that supports the health system. Language supporting broader telemedicine coverage is included in pending Congressional legislation.

## For additional questions

We are committed to providing you with answers and support in this rapidly changing environment.

Please continue to use your local representative as a resource or use the dedicated service line for all of your COVID- 19 related questions.

**Phone number:** 1-800-592-3005

**Email:** [COVIDquestions@humana.com](mailto:COVIDquestions@humana.com)

## Coverage questions: Eligibility

Q. Am I able to continue to cover employees if **part** of the workforce is laid-off in response to the COVID-19 pandemic?

A.

Fully Insured Plans	Self-Funded Plans
<p>Yes. We are relaxing the requirement that employees need to be actively working to be eligible for coverage. This will allow you to cover employees who have been laid-off.</p> <ul style="list-style-type: none"> <li>• Effective through May 31, 2020.</li> <li>• Monthly premium payment is required.</li> <li>• This coverage must be offered on a uniform, non-discriminatory basis.</li> </ul>	<p><b>If Humana is your stop loss carrier:</b>            Yes. You may continue to cover employees who have been laid-off even though they are not actively at work.</p> <ul style="list-style-type: none"> <li>• Effective through May 31, 2020.</li> <li>• Payment of administrative fees, claims costs and stop loss premium is required.</li> <li>• This coverage must be offered on a uniform, non-discriminatory basis.</li> </ul> <p><b>If Humana is NOT your stop loss carrier</b>            We recommend verifying coverage with your stop loss carrier.</p>

Q. Am I able to continue to cover employees if the **entire** workforce is laid-off in response to the COVID-19 pandemic?

A.

Fully Insured Plans	Self-Funded Plans
<p>Yes. If one person (e.g., owner, manager) remains employed and covered by the plan, you can continue to cover employees who have been laid-off.</p> <ul style="list-style-type: none"> <li>• Effective through May 31, 2020.</li> <li>• Monthly premium payment is required.</li> <li>• This coverage must be offered on a uniform, non-discriminatory basis.</li> </ul>	<p><b>If Humana is your stop loss carrier:</b>            Yes. If one person (e.g., owner, manager) remains employed and covered by the plan, you can continue to cover employees who have been laid-off.</p> <ul style="list-style-type: none"> <li>• Effective through May 31, 2020.</li> <li>• Payment of administrative fees, claims costs and stop loss premium is required.</li> <li>• This coverage must be offered on a uniform, non-discriminatory basis.</li> </ul> <p><b>If Humana is NOT your stop loss carrier:</b>            We recommend verifying coverage with your stop loss carrier.</p>

Q. Will continuation coverage be available for employees who have been laid off and as an employer are we able to offer continuation coverage to our employees at their own expense?

A.

Fully Insured Plans	Self-Funded Plans
<p><b>If one or more person remains employed and covered by the plan:</b></p> <ul style="list-style-type: none"> <li>• If you are subject to COBRA, employees can elect to continue coverage under COBRA by following the normal notice and election procedure.</li> <li>• If you are not subject to COBRA, employees can elect to continue coverage under the situs state continuation statute, if applicable. Small employers should notify employees of state continuation rights at the time they are laid-off.</li> </ul> <p><b>If there are no persons employed and covered by the plan:</b></p> <ul style="list-style-type: none"> <li>• The plan is terminated and neither COBRA nor state continuation is an option, if applicable.</li> <li>• Employees have a special enrollment period to enroll in individual coverage or have the option to purchase a short-term plan that is subject to medical underwriting.</li> </ul>	<p><b>If one or more person remains employed and covered by the plan:</b></p> <ul style="list-style-type: none"> <li>• If you are subject to COBRA, employees can elect to continue coverage under COBRA by following the normal notice and election procedure.</li> <li>• If you are not subject to COBRA, state continuation statutes generally do not apply and employees cannot elect to continue coverage.</li> </ul> <p><b>If there are no persons employed and covered by the plan:</b></p> <ul style="list-style-type: none"> <li>• The plan is terminated and COBRA is not an option. State continuation statutes generally do not apply to self-funded plans.</li> <li>• Employees have a special enrollment period to enroll in individual coverage or have the option to purchase a short-term plan that is subject to medical underwriting.</li> </ul>

Q. If a significant number of employees are laid-off today, how long will the employees have coverage?

A. If premiums have been paid for the full month, the employee coverage will continue for the entire month.

Q. Will employees who are laid off temporarily as a result of the COVID-19 pandemic be allowed to rejoin the fully insured plan without a waiting period when they return to work?

A. Yes. Humana will waive the waiting period for employees who are laid off temporarily as a result of COVID-19. New hires will be subject to standard waiting periods.

## Coverage questions: Billing

Q. Will my rates/premium be subject to change if enrollment drops by more than 10% as a result of the COVID-19 pandemic?

A. No. If the loss of enrollment is a result of the COVID-19 situation, rates and premiums will not be adjusted until your next renewal date.

Q. As a result of the COVID-19 pandemic, will Humana's renewal rate actions or quote responses be delayed or impacted?

A. No. We do not anticipate delays. We will continue to meet rate renewals and/or quote expectations in a timely manner.

Q. Will Humana allow a premium payment grace period?

A. Yes. Humana will continue to offer a 30-day grace period for premium payments, or applicable state law.

Q. Will Humana allow groups to delay their open enrollment beyond their normal renewal date timing?

A. Yes. To account for the significant disruption caused by the COVID-19 pandemic, Humana will continue to allow employers an additional 30 days from their effective date to complete open enrollment activities.

Q. (100+ employees, self-funded group) If my self-funded group lays off a large portion of our workforce due to the COVID-19 outbreak, will we need to change to fully insured funding?

A. If the layoffs are temporary in response to the COVID-19 outbreak, you will not be required to change from self-funded to fully insured at this time.

## What if I have more questions?

Q. I have more questions. Who can help?

A. Please continue to use your local representative as a resource or use the dedicated service line for all of your COVID-19 related questions. Phone number: 1-800-592-3005 and Email: [COVIDquestions@humana.com](mailto:COVIDquestions@humana.com)